**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,	
Plaintiff,	
v.	**Case No. 24-CR-0372-SEH**
ARTHUR EDWARD SUAREZ, JR., **KENDRA DEANNE SINGLETARY,** **DANA MICHAELLE STOKES,** **TONEY EUGENE BAHE,** **NATHAN ALLEN LEWELLING,** **KENNETH WAYNE TONEY,** **OSMAN ROLANDO SANCHEZ,** **KAYLA MARISA BRADFORD,** **JEREMY NATHANIEL STAGE,**	
Defendants.	

Notification of Intent to Offer Expert Witness Testimony

The United States submits this Notice pursuant to Federal Rules of Evidence 702, 703, and 705, and Federal Rules of Criminal Procedure 16(a)(1)(G)(i).

The United States intends to call Agent Claudio Tello, an Agent with the Oklahoma Bureau of Narcotics and Dangerous Drugs (OBN) in Tulsa, Oklahoma. Agent Tello has been a law enforcement officer since 2020 and an Agent with OBN since January 2024. Before working for OBN, Agent Tello was a police officer for the Owasso Police Department in Owasso, Oklahoma.

Agent Tello has participated in drug related investigations and his experience has ranged from drug conspiracy, unlawful manufacturing, importation, transportation,

to distribution of drugs. These investigations required Agent Tello to conduct wire and physical surveillance, author search warrants, including phone/Pen warrants, surveillance of undercover transactions, introduction of undercover agents, execution of search warrants, debriefing of informants, interviewing targets, review of taped conversations, and examination of drug records.

Agent Tello's education, training, and experience has allowed him to analyze data derived from a wide range of databases and apply it to on-going drug investigations. His education, training, and experience has also allowed Agent Tello to be knowledgeable on Tribal laws, specifically the Cherokee Nation. Agent Tello's education, training, and experience has given him the crucial and complex skills of analyzing, predicting, and understanding digital data as it is related to drug conspiracies and drug investigations.

Additionally, Agent Tello has participated in Title III investigations and understands how wire operations work. Please refer to Exhibit A, Agent Tello's *curriculum vitae*, for further information on his education, training, and experience.

Below, please find: (1) a complete statement of opinions that the government presently intends to elicit from the above expert witnesses in its case-in-chief; (2) the bases and reasons for those opinions; (3) the expert witness's qualifications; and (4) the government's disclosure regarding the expert witness's prior expert testimony during the previous 4 years and publications authored in the previous 10 years, where applicable. *See* Fed. R. Evid. 16(a)(1)(G)(iii).

1. *Statement of Opinion(s) and Bases/Reasons for Expert Opinion(s)*

Agent Tello will testify that the controlled dangerous substance,

methamphetamine, possessed in this case by several defendants from the start of the

conspiracy to the date of arrest, was possessed to distribute and to further the overall

conspiracy and members of the conspiracy used digital devices and applications to

carry-out the conspiracy. Agent Tello's opinion will be based upon facts elicited by

other witnesses, controlled buys, Title III Wire Intercepts, and other traditional

investigatory techniques. Those facts include, but are not limited to:

      a. The quantity of methamphetamine seized during the conspiracy;

      b. Controlled buys conducted during the conspiracy;

      c. Title III Wire communications between members of the conspiracy-these communications are in both text and vocal format and also include Zangi App messages which depict the conspiracy to distribute and possess with intent to distribute methamphetamine;

      d. Financial documents—displaying money transfers for methamphetamine;

      e. Tracking data—the vehicles used to distribute methamphetamine by members of the conspiracy;

      f. Phone data-tracking location data;

      g. Surveillance—law enforcement watched members of the conspiracy take substantial steps to further the conspiracy;

In addition to the facts referenced above, Agent Tello's ultimate opinion that the

methamphetamine possessed by defendant within the conspiracy, and the overall

conspiracy, will also be based upon Agent Tello's background, training, and

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experience as an OBN Agent, a drug investigator, and as an OBN Agent who worked and currently works drug related activities.

    2. *Prior Expert Testimony*

Agent Tello has testified as an expert in the following case(s) in the last 4 years:

State of Oklahoma v. Charles David Douglas, Tulsa County, CM-2023-2407, 2024.

    3. *Publications*

Agent Tello has not authored any publications within the past 10 years.

    4. *Witness Approval and Signature*

I have reviewed and approve of the summary of my anticipated testimony.

Dated: December __30__, 2024

/s/ Claudio Tello
Claudio Tello
OBN Agent

The government reserves the right to question this expert about other matters that may be raised during cross-examination or based upon the testimony elicited from defense experts, if any, or other witnesses or evidence that the defense introduces at trial. To the extent the Court allows the defense the same right, the government reserves the right to elicit any additional testimony that the experts are qualified to provide should the need arise based on further developments in preparing for and during the trial.

Further, the United States requests reciprocal discovery pursuant to Rule 16(b) and (b)(1)(C)(i) and reserves the right to modify this notice.

At the time of this Notice, Defendants Kenneth Wayne Toney, Osman Rolando Sanchez, and Jeremy Nathaniel Stage remain at large with an active federal arrest warrants.

Respectfully submitted,

CLINTON J. JOHNSON
United States Attorney

/s/ Mandy M. Mackenzie
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Certificate of Service

I hereby certify that on the 30th day of December, 2024, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrant:

Kathrine Greubel   Taylor McLawhorn
Defense Counsel for Suarez Jr.   *Defense Counsel for Singletary*

Jason Perkins   Michael Noland
Defense Counsel for Stokes   *Defense Counsel for Bahe*

Kara Pratt   Collin Rockett
Defense Counsel for Lewelling   *Defense Counsel for Bradford*

                                    /s/ Mandy M. Mackenzie
                                    Mandy M. Mackenzie
                                    Assistant United States Attorney